



Infrastructure · Water · Environment · Buildings

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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
King Highway Landfill Operable Unit 3 Progress Report (June 2012)

ENVIRONMENT

Dear Keith:

Date:  
July 13, 2012

On behalf of Georgia-Pacific LLC (Georgia-Pacific), attached is the June 2012 Monthly Progress Report for the King Highway Landfill Operable Unit 3 (KHL OU) of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Site) as per Section XVI of the Administrative Order by Consent for the Remedial Design/Remedial Action at the KHL OU, as was fully executed on February 8, 2000 (AOC). Please note, however, pursuant to Section XVI of the AOC, after a Certificate of Completion of Construction is issued by the Michigan Department of Environmental Quality (MDEQ), as provided in Section XXVII (Certificate of Completion of Construction) of the AOC, reports documenting operation, maintenance, and monitoring activities shall be submitted pursuant to the schedule set forth in the Operation and Maintenance Plan.

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Our ref:  
B0064583.0003.00675

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

Patrick McGuire  
Principal Environmental Engineer

Attachment

Copies:

Garry Griffith, P.E., Georgia-Pacific LLC  
Daria Devantier, Michigan Department of Environmental Quality  
Michael Berkoff, USEPA Region 5  
Dawn Penniman, P.E., ARCADIS

**PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/  
KALAMAZOO RIVER SUPERFUND SITE  
KING HIGHWAY LANDFILL OPERABLE UNIT 3**

**JUNE 2012**

**PREPARED JULY 13, 2012**

**ON BEHALF OF GEORGIA-PACIFIC LLC**

**SUBMITTED TO**

**KEITH KRAWCZYK, PROJECT COORDINATOR  
REMEDIATION AND REDEVELOPMENT DIVISION**

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Georgia-Pacific LLC  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
King Highway Landfill Operable Unit 3  
June 2012 Monthly Progress Report**

**Remedial Activities**

- On June 5, ARCADIS submitted to MDEQ the May 2012 Monthly Progress Report.
- On June 6, MDEQ transmitted an e-mail to ARCADIS providing comments on the May 2012 Monthly Progress Report.
- On June 14, ARCADIS submitted to MDEQ the revised May 2012 Monthly Progress.
- In June, draft revisions to the Restrictive Covenants (RCs) for the Lagoon and King Highway Landfill (KHL) parcels were discussed with the Michigan Department of Attorney General.

**Other Governmental Interaction**

- In June, the first amended and restated easement agreement for the River Trail, and the amended access agreement for the access road to the City of Kalamazoo sanitary sewer lift station, both located on the Lagoon parcel, were signed by the Kalamazoo County Board of Commissioners and City of Kalamazoo, respectively.

**Operation, Maintenance and Monitoring Activities**

- On May 21, 24, 30, 31, and June 1, ARCADIS collected water level measurements in preparation of the 2012 annual groundwater sampling event.
- The week of June 4, ARCADIS conducted the 2012 annual groundwater sampling event including the collection of daily water level measurements.
- On June 5, MDEQ contacted ARCADIS requesting information on the status of the institutional controls for the King Highway Landfill Operable Unit (KHL OU).
- On June 5, ARCADIS transmitted an e-mail to MDEQ with a response on the status of the institutional controls at the KHL OU.
- On June 7, ARCADIS conducted the 2012 2<sup>nd</sup> quarter landfill gas monitoring event.
- On June 7, ARCADIS performed additional soil gas sampling within six other areas of stressed vegetation observed on the cover system in accordance with the April 27, 2012 Stressed Vegetation Area Sampling Plan. Methane was not detected above the lower explosive limit within any of the additional stressed vegetation sampling locations on the final cover system.
- The week of June 7, ARCADIS removed the remaining root mass from the outlet of the north pore water pipe, which was partially removed during the May 31, 2012 sampling of the north pore water discharge. In addition, riprap was place at the outlet of the north pore water pipe.

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- On June 8, MDEQ transmitted an e-mail to ARCADIS requesting information on the status of the institutional controls for the KHL OU.
- On June 8, Georgia-Pacific responded to MDEQ with a voice message regarding the status of the institutional controls at the KHL OU.
- On June 8, ARCADIS conducted the 2012 2<sup>nd</sup> quarter landfill inspection.
- On June 15, ARCADIS received the analytical data associated with the final cover system soil and north pore water outfall sampling from KAR Laboratories, Inc.
- On June 22, on behalf of Georgia-Pacific, ARCADIS submitted the 2012 2<sup>nd</sup> quarter landfill inspection report to MDEQ and the United States Environmental Protection Agency (USEPA). The inspection report, which was submitted to the MDEQ and USEPA on June 22, identified the following unsatisfactory items that require a response:
  - Stressed vegetation was observed on the north side of the landfill, south of the diversion berm; and east of the sedimentation basin outside the extent of the final cover system.
  - Exposed unknown geotextile was observed in the southwest corner of the landfill, outside the limits of the cover system and adjacent to the sedimentation basin.
  - Several burrowing animal holes were observed at the landfill outside the extent of the final cover system.
  - A low-lying area was observed in the ditch immediately south of the gravel access road on the north side of the landfill where previous ponding of water was observed.
  - Root material blocking the outlet of the north pore water pipe was observed and promptly removed. The south pore water pipe could not be located.
  - Bolts needing replacement were observed on the flush mount well MW-5 well cover. The bolts were replaced with new bolts.
  - Perimeter fence was observed to be missing, an approximate 20 foot section of barbwire in the northwest corner of the landfill. The barbed wire was removed during work associated with the City of Kalamazoo sanitary sewer project, and will be repaired and re-installed along with a gate once the project is completed in 2012.
- On June 27, on behalf of Georgia-Pacific, ARCADIS submitted the Stressed Vegetation Sampling Results and Work Plan (Stressed Vegetation Work Plan) to MDEQ and USEPA presenting the activities to be completed to repair the geomembrane liner (if determined to be necessary), and address the other areas of stressed vegetation observed at the KHL.

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**Upcoming Activities**

- In July, ARCADIS will provide MDEQ with the Kalamazoo River elevation and flow data, and KHL OU monitoring well elevation data used to establish the approach to be used for determining groundwater flow conditions prior to sampling groundwater.
- In July, ARCADIS will coordinate with MDEQ to schedule the 2012 3<sup>rd</sup> quarter landfill gas monitoring event, which is tentatively scheduled for August.
- By July 6, 2012, ARCADIS is scheduled to submit to MDEQ the 2012 2<sup>nd</sup> quarter landfill gas monitoring report.
- Upon receipt of the analytical data associated with the 2012 annual groundwater sampling event, ARCADIS will begin data validation. The validated data report and summary table will be submitted to MDEQ within 60 days of sample collection (i.e., on or before August 6, 2012).
- By August 15, 2012, ARCADIS is scheduled to submit to MDEQ the results of the final cover system soil and north pore water outfall sampling.
- Following MDEQ's approval of the Stressed Vegetation Work Plan (which is expected in July) and scheduling of Chesapeake, the subcontractor who will repair the geomembrane liner, Terra Contracting, LLC (Terra) will mobilize to the KHL and initiate repair activities associated with the stressed vegetation. While Terra is onsite, the following additional activities will be performed:
  - The six other areas of stressed vegetation observed at the KHL and investigated on June 7, 2012, will receive a layer of topsoil, seed, and mulch to facilitate vegetative growth in accordance with the Stressed Vegetation Work Plan.
  - The low-lying area in the ditch located along the access road on the north side of landfill will be filled with topsoil, regraded, seeded, and mulched to prevent future ponding of water in accordance with the Stressed Vegetation Work Plan.
  - The south pore water outlet pipe will be surveyed, located, and inspected for blockages, and any blockages removed.
  - The holes created by burrowing animals will be filled and the areas seeded and mulched.
  - The exposed geotextile in the southwest corner of the sedimentation basin will be inspected to determine whether it is a remnant of the erosion and sediment controls implemented during the final cover system installation. Additional topsoil will be placed over the geotextile, and the area will be seeded and mulched.

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- In July, Georgia-Pacific anticipates the receipt of MDEQ's comments on the revised DRAFT FINAL Operation and Maintenance Plan (Deliverable 12) and the revised DRAFT FINAL Completion Report (Deliverable 14).
- In July, Georgia Pacific anticipates that the RCs and associated easements and access agreements will be finalized.